

# KING & SPALDING

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November 8, 2021

## VIA ECF

Hon. Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:   *Rothschild v. General Motors LLC* - No. 19-cv-5240-DLI-RM  
Joint Motion to Hold Case Deadlines in Abeyance Pending Finalization of  
Settlement**

Dear Magistrate Judge Mann:

Plaintiff Mark Rothschild and Defendant General Motors LLC (collectively, “the Parties”) hereby file this Joint Motion to Hold Case Deadlines in Abeyance Pending Finalization of Settlement, respectfully showing the Court as follows:

1. The Parties are pleased to notify the Court that they reached an agreement in principle to resolve this matter on an individual basis and are in the process of negotiating a settlement agreement. The parties anticipate completing that process and filing a stipulation of dismissal of the plaintiff’s case within the next 30 days.
2. Accordingly, the Parties’ jointly request that the Court enter an Order holding all case deadlines in abeyance for 30 days to conserve the Parties’ and Court’s resources while they finalize the resolution of this matter.

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WHEREFORE, based on the foregoing, the parties respectfully request that the Court enter an Order holding all case deadlines in abeyance for 30 days pending finalization of the Parties' settlement.

Respectfully submitted,

/s/ Stephen B. Devereaux

/s/ Nicholas A. Migliaccio

Stephen B. Devereaux

*Counsel for Defendant General Motors LLC*

Nicholas A. Migliaccio

*Counsel for Plaintiff Mark Rothschild*

cc: All Counsel of Record (via ECF)